

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al. :
Plaintiffs, :
v. : C.A. No. 04-312L
JEFFREY DERDERIAN, et al. :
Defendants :

MOTION FOR ENTRY OF APPEARANCE

PRO HAC VICE

Plaintiff/defendant JBL, Inc. f/k/a James B. Lansing Sound, Inc. d/b/a JBL Professional hereby moves that Georgia A. Sullivan, Esq. be admitted *pro hac vice* in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

☐ The case involves the following complex area of the law, in which pro hac vice counsel specializes: _____

☐ Pro hac vice counsel's long-standing representation of the client(s): _____

☐ The local trial bar lacks experience in the field of: _____

☐ The case involves complex legal questions under the law of a foreign jurisdiction with which pro hac vice counsel is familiar, specifically: _____


☐ The case requires extensive discovery in a foreign jurisdiction convenient to pro hac vice counsel, as follows: _____

☐ It is a criminal case, and pro hac vice counsel is defendant's counsel of choice.

X Other: We have been retained as staff counsel by the Hartford Insurance Company to represent the defendant and to assist local counsel in the defense of this matter based upon the anticipated large number of parties and magnitude of discovery.

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[Plaintiffs/Defendant(s)]

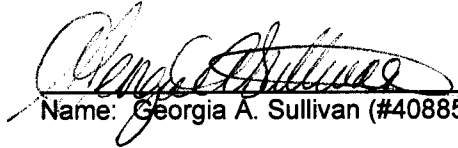
By: 
C. Russell Bengtson (#1233)
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Attorney for JBL, Inc.
f/k/a James B. Lansing Sound,
Inc. d/b/a JBL Professional


DATED: 8/14/04

ATTORNEY'S CERTIFICATION FOR PRO HAC VICE ADMISSION

- (1) I certify that I am a member in good standing of the bar of the State(s) of Connecticut and the following federal district court bar(s) District of Connecticut, without any restriction on my eligibility to practice, and that I understand my obligation to notify this Court immediately of any change respecting my status in this respect.
- (2) I am currently admitted, and/or within the preceding 24 months have applied to be admitted, in the following cases in this district: N/A.
- (3) I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.
- (4) For purposes of this case I have associated with local associate counsel identified below, and have read, acknowledge, and will observe the requirements of this Court respecting the participation of local associate counsel, as set out in Local Rule 5, recognizing that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in the case.

I certify that I have read and join in the foregoing motion, and acknowledge and agree to observe the requirements of Local Rule 5 in its entirety and as it relates to the participation and responsibilities of local associate counsel.


Name: Georgia A. Sullivan (#408856)


Local Associate Counsel C. Russell Bengtson

1233 _____

R.I. Bar ID #

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ORDER:

This motion is hereby _____

U.S. District Judge

Date: _____

CERTIFICATION OF SERVICE

I hereby certify that on the 16th day of September, 2004, I mailed a true copy of the within Motion for Entry of Appearance Pro Hac Vice via first class mail, postage prepaid to counsel on the attached service list.

Judith Landolf

GRAY, ET AL V. JEFFREY DERDERIAN, ET AL (USDC-RI C.A. NO. 04-312L)

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